# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF WISCONSIN

Case No.: 12-28460

Judge: James E. Shapiro

Chapter: Chapter 13

In Re: Faith N Huffman

### NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN

Geraci Law, LLC, Attorneys for the Debtor, have filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, on or before 21 days from the date of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk, U.S. Bankruptcy Court 517 E. Wisconsin Ave., Rm. 126 Milwaukee, WI 53202

If you mail your request or response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to the parties listed below and on the attached mailing matrix:

Andrew M. Golanowski Geraci Law, LLC 2505 N. Mayfair Road, Suite 101 Wauwatosa, WI 53226

Phone: (414) 475-0100 Email: wal@geracilaw.com

Rec. No: 560026

United States Trustee Eastern District of Wisconsin 517 East Wisconsin Avenue, Room 430 Milwaukee, WI 53202 Thomas J. King 1012 W. 20th St., Box 3170

Oshkosh, WI 54903

Geraci Law, LLC Andrew M. Golanowski 2505 N. Mayfair Rd. #101 Wauwatosa, WI 53226 Faith N Huffman

5210 N 64th St Milwaukee, WI 53218

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

### **REQUEST TO MODIFY CHAPTER 13 PLAN**

1.	The Proponent	of this	modification	is the	e Debtor,	through	her	Attorneys,	Geraci
	Law, LLC.								

	24, 220.								
2.	This is a request to modify a Chapter 13 Plan (Select A. or B.):								
	A	_ post-confirmation							
	BX_	pre-confirmation (Select i. or ii.);							
	i.	Debtor(s)/Debtor(s) attorney certifies that the proposed							
		modification does not materially or adversely affect creditors							
		(Local Bankruptcy Rule 3015(b)); or							
	ii.	_X Debtor(s)/Debtor(s) attorney certifies that the proposed							
		modification materially adversely affects only the following							
		creditors and a copy of the proposed modification has been served							
		on them (Local Bankruptcy Rule 3015(b)). The creditors are (See							

- on them (Local Bankruptcy Rule 3015(b)). The creditors are (See Attached List).
- 3. The Proponent wishes to modify the Chapter 13 Plan to do the following: See Below.
- 4. The reason for the modification is to provide for all claims.

Rec. No: 560026

- 5. Select A. or B.
  - A. \_\_\_\_\_ The Chapter 13 Plan confirmed or last modified on \_\_\_\_\_ (date) is modified as follows: (State the specific language of the modification.)

B. X The unconfirmed Chapter 13 Plan is modified as follows:

- Debtor shall pay \$310 per month. Allowed general unsecured claims shall receive a pro rata share of not less than \$7,000. No payment shall be made to Landmark Credit Union on its claim secured by the Debtor's 2007 Cadillac DTS. It was involved in an accident, and insurance is paying out to Landmark Credit Union direct as the loss payee. Debtors attorneys fees are \$3,400. The entire balance is to be paid through the Chapter 13 Plan.
- C. All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the event of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.
- 6. BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION
  CERTIFIES THAT, AFTER REVIEW OF THE MODFICATION AND
  ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE
  REMAINING TERMS AND PROVISIONS OF THE PLAN ARE
  CONSISTENT WITH THE PROPOSED MODIFICATIONS.

WHEREFORE, the Proponent requests that the Court approve the modification to the Chapter 13 Plan as stated herein.

Respectfully submitted and dated this Wednesday, August 29, 2012.

Rec. No: 560026

## By: <u>/s/ Andrew M. Golanowski</u> Andrew M. Golanowski Attorney for Debtor

1055499 Bar #:

Andrew M. Golanowski Geraci Law, LLC 2505 N. Mayfair Road, Suite 101 Wauwatosa, WI 53226 Phone: (414) 475-0100 Fax: (312) 332-6354

Email: wal@geracilaw.com

Rec. No: 560026

Notice and Request to Modify Chapter 13 Plan

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF WISCONSIN

Case No.: 12-28460

Judge: James E. Shapiro

Chapter: Chapter 13

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#### **CERTIFICATE OF SERVICE**

The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Request to Modify Chapter 13 Plan were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Wednesday, August 29, 2012:

Faith Huffman 5210 N 64th St Milwaukee, WI 53218 See Attached List

Additionally, the documents referenced above were also served via electronic means on the following individuals on Wednesday, August 29, 2012:

United States Trustee
Eastern District of Wisconsin
517 E. Wisconsin Ave.
Milwaukee, WI 53202

Thomas J. King

1012 W. 20th St., Box 3170

Oshkosh, WI 54903

Dated this Wednesday, August 29, 2012.

By: <u>/s/ Andrew M. Golanowski</u>

Andrew M. Golanowski Attorney of the Debtor

Bar # 1055499

Andrew M. Golanowski Geraci Law, LLC 2505 N. Mayfair Road, Suite 101 Wauwatosa, WI 53226 Phone: (414) 475-0100

Fax: (312) 332-6354 Email: wal@geracilaw.com

Rec. No: 560026

Notice and Request to Modify Chapter 13 Plan

**MHFS** 

Attn: Bankruptcy Dept. 10200 W Innovation Dr St Milwaukee, WI 53226

Edsouth/Glelsi

Attn: Bankruptcy Dept.

Po Box 7860

Madison, WI 53707

Landmark Credit Union Attn: Bankruptcy Dept.

Po Box 51138

New Berlin, WI 53151

Landmark Credit Union Attn: Bankruptcy Dept.

Po Box 51138

New Berlin, WI 53151

Wisconsin Electric Power Attn: Bankruptcy Dept. 231 W Michigan St A130 Milwaukee, WI 53203

Wisconsin Electric Power Attn: Bankruptcy Dept. 231 W Michigan St A130 Milwaukee, WI 53203

Americollect INC Attn: Bankruptcy Dept. 1851 S Alverno Rd Manitowoc, WI 54220

**DEPT OF EDUCATION/NELN** Attn: Bankruptcy Dept.

121 S 13Th St Lincoln, NE 68508

DEPT OF EDUCATION/NELN

Attn: Bankruptcy Dept. 121 S 13Th St Lincoln, NE 68508

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DEPT OF EDUCATION/NELN

Attn: Bankruptcy Dept. 121 S 13Th St Lincoln, NE 68508

Sallie Mae

Attn: Bankruptcy Dept.

Po Box 9500

Wilkes-Barre, PA 18773

Sallie Mae

Attn: Bankruptcy Dept.

Po Box 9500

Wilkes-Barre, PA 18773

Sallie Mae

Attn: Bankruptcy Dept.

Po Box 9500

Wilkes-Barre, PA 18773

Sallie Mae

Attn: Bankruptcy Dept.

Po Box 9500

Wilkes-Barre, PA 18773

Sallie Mae

Attn: Bankruptcy Dept.

Po Box 9500

Wilkes-Barre, PA 18773

Wells Fargo Home Mortgage

Attn: Bankruptcy Dept. 8480 Stagecoach Cir Frederick, MD 21701

Wells Fargo Bank

Attn: Bankruptcy Dept.

Po Box 31557 Billings, MT 59107

Equifax

Attn: Bankruptcy Dept. PO Box 740241 Atlanta, GA 30374

Experian

Attn: Bankruptcy Dept.

PO Box 2002 Allen, TX 75013

Transunion

Attn: Bankruptcy Dept. PO Box 1000 Chester, PA 19022

Kohls/Capone

Attn: Bankruptcy Dept. N56 W 17000 Ridgewood Dr Menomonee Falls, WI 53051

**HSBC** 

Attn: Bankruptcy Dept.

Po Box 5253

Carol Stream, IL 60197

Chase

Attn: Bankruptcy Dept.

Po Box 15298

Wilmington, DE 19850

IRS Priority Debt

Attn: Bankruptcy Dept.

PO Box 7346

Philadelphia, PA 19101

IRS Priority Debt

Attn: Bankruptcy Dept. PO Box 7346

Philadelphia, PA 19101

IRS Priority Debt

Attn: Bankruptcy Dept. PO Box 7346

Philadelphia, PA 19101

Milwaukee Violations Bureau Notice of Bankruptcy PO Box 346 Milwaukee, WI 53201

IRS Priority Debt Attn: Bankruptcy Dept. PO Box 7346 Philadelphia, PA 19101

UW Stout Board of Regents 712 S. Broadway Street Menomonie, WI 54751

Eastbrook Academy Attn: Bankruptcy Dept. 5373 N Greenbay Ave Milwaukee, WI 53209

Michael Donohoo DDs Attn: Bankruptcy Dept. 7623 W Burleigh St Milwaukee, WI 53222

WI Dept of Children & Families Bankruptcy Dept 201 E Washington Ave, 2nd fl Madison, WI 53708

Milwaukee County Circuit Cour 2012SC001963 901 N. 9th ST. Milwaukee, WI 53233

Gray & Associates Attn: Bankruptcy Department 16345 West Glendale Dr. New Berlin, WI 53151

Milwaukee County Circuit Cour 2011CV004539 901 N. 9th ST. Milwaukee, WI 53233

Darnieder and Geraghty 2012SC001963 735 N. Water St., Suite 930 Milwaukee, WI 53202

Kohn Law Firm Attn: Bankruptcy Department 735 N Water St. Ste 1300 Milwaukee, WI 53202